



DEFENDANT'S
EXHIBIT

A

December 22, 2023

Via Email

Craig Sanders
Sanders Law Group
333 Earle Ovington Blvd., Suite 402
Uniondale, NY 11553

Re: Global Weather Productions, LLC v. Joe Pags Media, LLC

Dear Mr. Sanders:

We represent M3 Media Management, LLC (“M3”), of New York, NY.

M3 is the entity responsible for managing the Facebook account of Joe Pags Media and is the main contributor of material to that account. In that capacity M3—not Joe Pags Media—obtained, and posted to that account, the Video which is the subject of Global Weather Productions, LLC’s Complaint for copyright infringement in the above-entitled action. Joe Pags Media is merely the owner of the Facebook account, and had no involvement whatsoever in the selection of content or operation of the account, at relevant times. Thus, it undertook no volitional act in regard to the infringing acts alleged in the Complaint.

Under these circumstances, we believe that there is no possible infringement claim against Joe Pags Media; any infringement claim would need to be directed to M3, which can be properly filed in the Southern District of New York. Nevertheless, we would first like to address the matter with you, toward a potential resolution.

I ask that you contact me following receipt of this letter.

Sincerely,
McHALE & SLAVIN, P.A.

Edward F. McHale

EFM/ac